

EXHIBIT 22

REDACTED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION**

No. 21-MD-3010 (PKC)

DECLARATION OF [REDACTED]

I, [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

AdSense

2. Introduced in June 2003, AdSense is an ad network generally designed as an easy-to-implement solution for publishers that might not have a significant direct sales business or prefer the ease of monetizing their ad space by adding a single piece of code to their site. One of the AdSense services is AdSense for Content,² which allows publishers to sell display ad inventory on their websites. These ads were originally text-based, but Google introduced image formats by 2004.

¹ Google Ad Manager combines functionalities that were previously called DoubleClick for Publishers (“DFP”) and AdX.

² References to “AdSense” in the rest of this declaration refer to AdSense for Content.

3. With its launch in June 2003, AdSense provided Google Ads (then AdWords) buyers with the ability to purchase display ads on the websites of AdSense publishers without using a publisher ad server. Today, publishers may still use AdSense without a separate publisher ad server like the ad serving functionality of Google Ad Manager. However, AdSense does not offer the full functionality of a publisher ad server. For example, it does not serve ads that publishers have sold directly to advertisers.

4. Following Google's acquisition of DoubleClick in 2008, Google added a feature (known as AdSense "backfill") to allow DFP publishers to connect with AdSense demand.

5. Publishers using non-Google publisher ad servers can connect with AdSense demand. In those configurations, publishers using non-Google publisher ad servers can send ad requests to AdSense and sell impressions through AdSense.

6. At least since 2009, AdSense has incorporated an auction functionality that allows buyers (which today include DSPs and ad networks) to bid for the inventory made available by publishers using AdSense. Today, AdSense inventory may be offered to Google Ads, Display & Video 360 ("DV360"), and third-party DSPs and ad networks via Authorized Buyers at the option of the publisher. While AdSense calls Authorized Buyers via Google's serving infrastructure, this call to Authorized Buyers is distinct from Google Ad Manager's call to Authorized Buyers. AdSense does not accept bids coming from third-party ad exchanges, and Google would have to make significant modifications to AdSense's design to accept bids from third-party ad exchanges.

7. AdSense transitioned from a second-price auction to a first-price auction between October and November 2021.

8. AdSense operates on a revenue-share model. The revenue share is a percentage of the auction closing price paid by buyers for ads appearing on the publishers' websites. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9. Historically, most AdSense publishers were paid on a cost-per-click ("CPC") basis. In January 2024, AdSense moved to a cost-per-mille ("CPM") payment model.

Data Transfer Report Files

10. Google provides publishers using Google Ad Manager 360 with the option to subscribe to Data Transfer report files that contain non-aggregated event-level data to help publishers understand the performance of their advertising inventory. There are separate Data Transfer report files for different types of events – including Bids, Impressions, Clicks, and other events – and publishers can choose which reports to receive.

11. One type of Data Transfer report file, known as the Bids Data Transfer report file ("BDT file"), contains information about the bids that the publisher received on its inventory. Prior to September 2019, Google allowed buyers to opt out of including information about their bids in BDT files. Because many bidders chose to opt-out, BDT files likely did not provide publishers with information about the complete set of bids for their inventory. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. When Google transitioned to a Unified First Price Auction in September 2019, Google removed the option for bidders to opt out of including information about their bids in BDT files. With this change, Google intended to provide publishers more information about the new first-price auction by including a complete set of bids from all Authorized Buyers, Open Bidding buyers, Google Ads, and DV360.

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

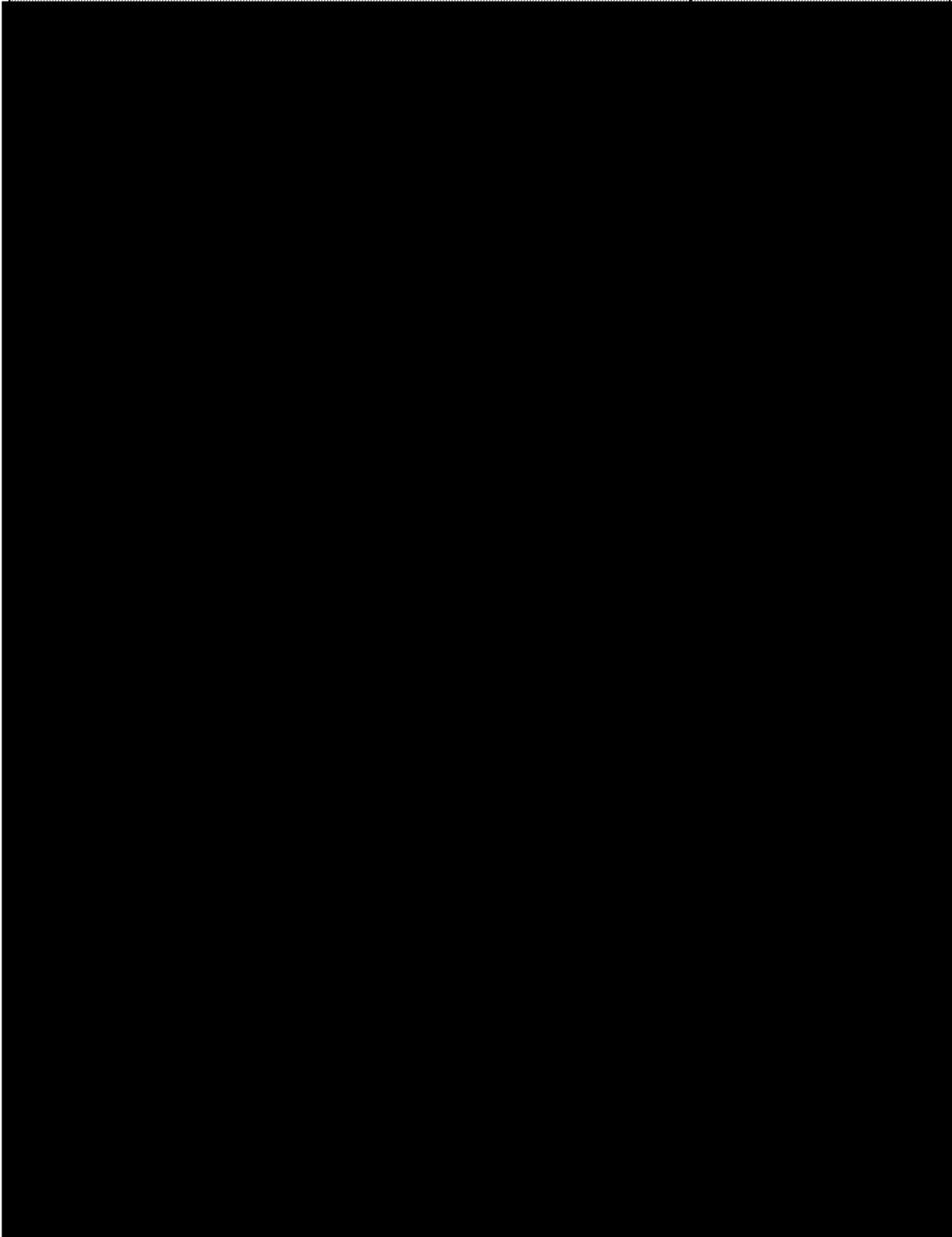
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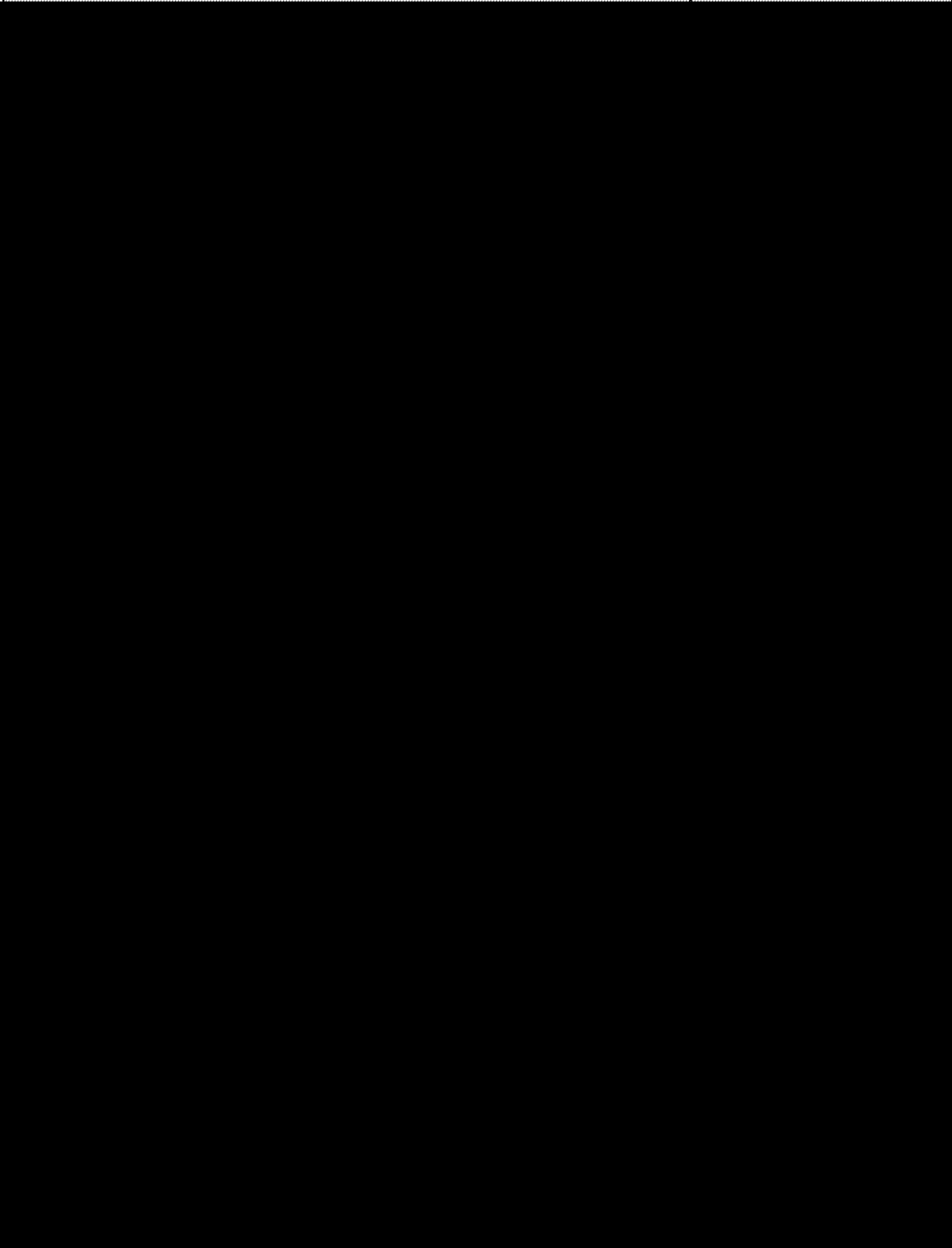
[REDACTED]

14. In January 2024, Google made available to publishers using Google Ad Manager 360 a modified Bids Data Transfer report file – the Joinable Bids Data Transfer report file (“Joinable BDT file”) – that could be joined with other Data Transfer report files containing bid information for requests originating outside of Europe. Today, Google allows publishers to choose to subscribe to BDT files in the same format in which they have been available since September 2019 (“non-joinable BDT files”) or to the new, modified Joinable BDT files.

15. As of June 25, 2024, the [REDACTED] publishers listed below subscribe to receive non-joinable BDT files.

Publishers	Network ID
[REDACTED]	

Publishers	Network ID
	

Publishers	Network ID
	

Publishers	Network ID

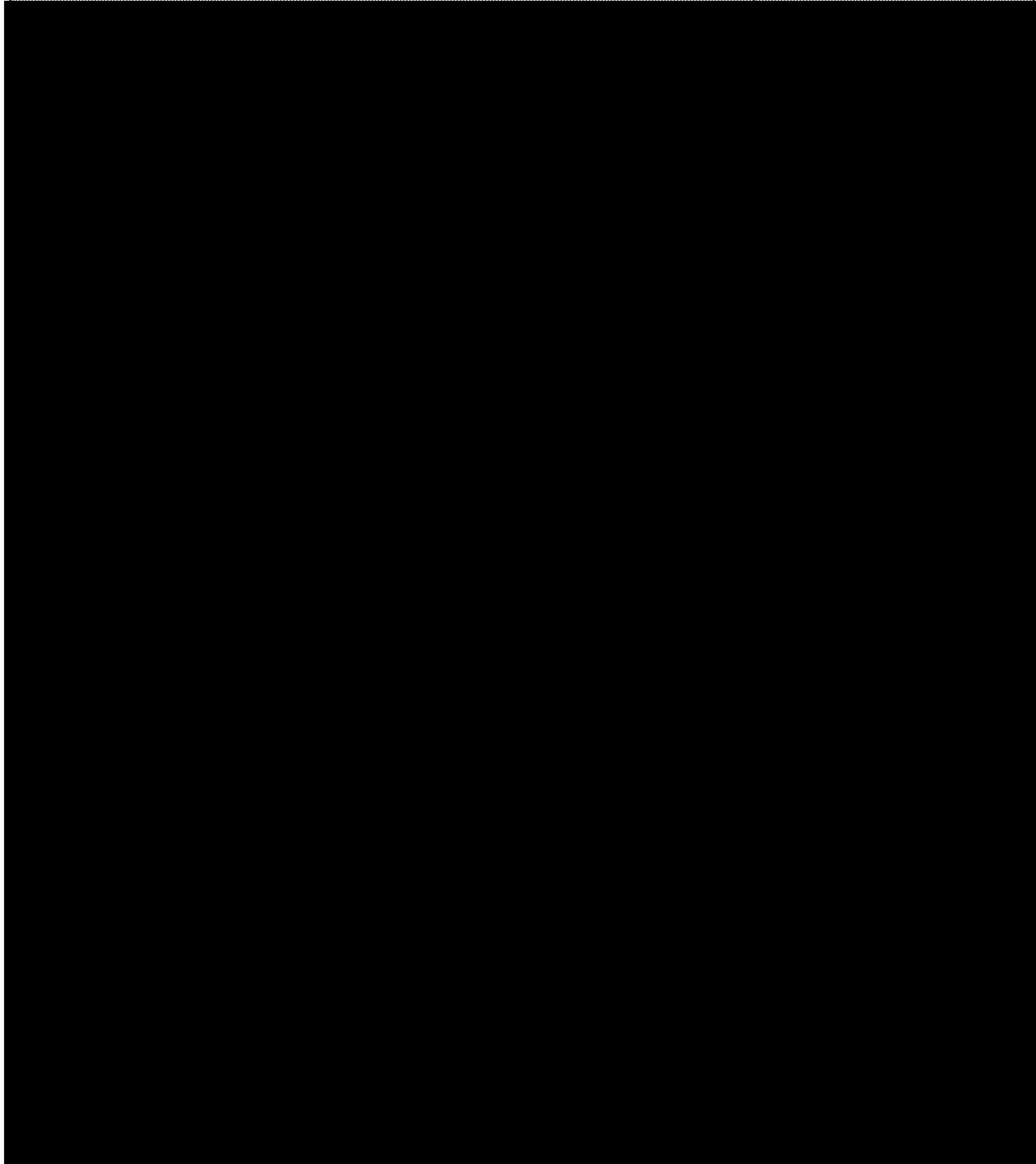
16. As of June 25, 2024, the [REDACTED] publishers listed below subscribe to receive Joinable BDT files.

Publisher	Network ID

Publisher	Network ID

17. As of August 31, 2019, the [REDACTED] publishers listed below subscribed to receive BDT files.

Publisher	Network ID

Publisher	Network ID
	

18. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 28th day of June 2024, in [REDACTED].

[REDACTED]